

1 TODD M. LEVENTHAL, ESQ
Leventhal and Associates
2 Nevada Bar No. 008543
600 South Third Street
3 Las Vegas, Nevada 89101
(702) 472-8686
4 Attorney for Defendant
SAMUEL L. DAVIS
5

6 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

7 UNITED STATES OF AMERICA,)
8)

9 Plaintiff,)

10 vs.)

11 SAMUEL L. DAVIS,)

12 Defendant.)

CR-09-cr-00078-JCM-(RJJ)

MOTION TO MODIFY TIME
SET FOR SELF SURRENDER

13 COMES NOW, SAMUEL DAVIS, by and through his counsel, TODD M.
14 LEVENTHAL, ESQ., and hereby moves this Honorable Court to continue the time set for Mr.
15 Davis to Self Surrender to the Bureau of Prisons.

16 Mr. Davis was sentenced on October 27, 2011. As part of the sentencing order, this
17 Honorable Court allowed Mr. Davis to self surrender on January 31, 2012. Mr. Davis recently
18 saw Douglas M. Linford, D.O., of the Adams County Health Center for Diabetes. Mr. Davis
19 was placed on an oral diabetic medication, however, Douglas M. Linford D.O. has recommended
20 that at this time, Mr. Davis remain under the care of Adams County Health Center while his
21 medication is switched to insulin. (See Exhibit 1)

22 Therefore, Mr. Davis respectfully requests that this court allow him to self surrender in an
23

24 ///

25 //

26 //

27
28

1 additional ninety days (90). By that time, Mr. Davis should have adapted to his new medication.
2 The new self surrender day would be April 27, 2012 by 12:00 p.m.

3
4 RESPECTFULLY SUBMITTED:

5
6 DATED this 25th day of January, 2012

7
8
9 /s/
10 Todd M. Leventhal, Esq.



**ADAMS COUNTY
HEALTH CENTER, INC.**
... preserving the future of your health care

January 25, 2012

RE: Samuel Davis
DOB: 8/7/1954

Dear Judge James C. Mahan:

I recommend that Samuel Davis be allowed to see a diabetic specialist for institution of insulin for his diabetes. He is on the maximum recommended of his oral diabetic medication and his diabetes is not controlled.

I have recommended that he be evaluated at the Humphrey's Diabetic Center to make the switch from oral medications to insulin. I also recommend that he continue in the care of Humphrey's until he is in a stable state.

Thank you for your consideration.

Sincerely,


Douglas M. Linford, D.O.